

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Structure and Practices)	CG Docket No. 10-51
of the Video Relay Service)	
Program)	
)	
Comments of CSDVRS)	
_____)	

COMMENTS OF CSDVRS, LLC

CSDVRS, LLC, (“CSDVRS”) by and through undersigned counsel, hereby submits its comments to the Notice of Proposed Rulemaking released by the Federal Communications Commission (“FCC” or “Commission”) on September 17, 2010 concerning proposed rules for the continued use of toll free telephone numbers within the Video Relay Service (“VRS”) program.¹ CSDVRS lauds the Commission’s efforts to clarify misconceptions about the use of toll free numbers, and to lay the groundwork for the utilization of those numbers moving forward. CSDVRS herein addresses the issues raised in the NPRM in kind and as permitted by Commission rules during the comment period.

1. User Selected Toll Free Access²

The Commission has sought comment on the prohibition of the automatic assignment of toll free numbers by default providers. CSDVRS fully supports this measure as a means to meet the Commission’s efforts to encourage the use of local ten-digit numbers, rather than toll free numbers. CSDVRS would further comment that this measure will also prevent certain providers

¹ See, *In the Matter of Structure and Practices of the Video Relay Service Program*, Notice of Proposed Rulemaking, CG Docket 10-51, FCC 10-161, (September 17, 2010)(hereinafter “NPRM”).

² NPRM at ¶16

from creating a closed network of videophones through the use of a proprietary toll free number database.

2. Continuing Use of and Access to Toll Free Numbers and No Support for Toll Free Numbers from the TRS Fund³

CSDVRS commends that Commission for its recognition of the utility of toll free numbers in VRS, particularly for businesses. CSDVRS does not believe a forced exit of the provision of toll-free numbers to consumers (particularly businesses) would be either equitable, feasible, nor in the spirit of the functional equivalency mandate of the Communications Act.⁴ As such, CSDVRS agrees with the Commission's proposal to permit iTRS users to keep their toll free numbers.

CSDVRS agrees with the Commission's findings that the costs of assigning and providing toll free numbers should not be compensable from the Interstate TRS fund ("Fund") and that users should be compelled to utilize a subscription service for toll free numbers as is the case in hearing telephony. CSDVRS would suggest, however, in the interests of maintaining equal access to the use of toll free numbers by deaf, hard-of-hearing, and deaf-blind individuals, that the FCC set a minimum allowable price charged to an iTRS consumer for a toll free number at \$9.95 per month.

3. Transfer of Toll Free Numbers⁵

In regard to transferring toll free numbers from VRS providers to subscription services, CSDVRS submits that providers are in the unique position to immediately advise its customers

³ NPRM at ¶¶17-18

⁴ *See*, 47 U.S.C. §225

⁵ NPRM at ¶¶19-20

of a change in Commission policy mandating the move to a subscription service. CSDVRS believes this matter is tied directly to consumer outreach issues raised elsewhere in the NPRM and addressed herein.

In regard to technical aspects of routing, CSDVRS agrees with the Commission's proposed mandate of mapping toll free numbers to consumers' local numbers through the iTRS database. CSDVRS would further submit that any VRS provider that chooses to continue to provide toll free numbers must also support portability of those numbers as described and required in the Local Number Portability ("LPN") rules that were delineated in the 2008 Numbering Orders.⁶ In addition, as part of the implementation of toll free number portability, CSDVRS would urge the Commission to expand the capabilities of the NeuStar database to allow VRS providers to utilize the Neustar interface to query the assignment of a toll free number. By doing so, Neustar could provide the local number and IP address that was mapped to the toll free number stored in the SMS/800 database. By adding this capability, the continued use of toll free numbers by businesses owned and operated by deaf individuals would not be impacted. This would also facilitate the elimination of toll-free numbers from the iTRS database as raised in the NPRM and discussed below.

4. Transition Period and Removal of Numbers from the iTRS Directory⁷

In regard to the transition time period, succinctly, CSDVRS agrees with the Commission's proposed one-year transition plan to implement the measures raised in the NPRM.

⁶ See, *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Notice of Proposed Rulemaking, CG Docket 03-123, FCC 08-151 (June 24, 2008); *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Second Report and Order and Order on Reconsiderations, CG Docket 03-123, FCC 08-275 (December 19, 2008).

⁷ NPRM at ¶¶23-24

This will allow ample time for providers to undertake consumer outreach and any necessary technological adjustments.

CSDVRS is in support of the Commission's proposed mandate to remove all non-mapped toll free numbers from the iTRS Directory at the close of the transition period. As alluded to hereinabove, CSDVRS believes that a Commission mandate to open up the NeuStar database to querying will prevent any service disruptions occasioned by removing the unmapped numbers. CSDVRS cannot proffer any reason or purpose in maintaining unmapped numbers in the database.

5. Consumer Outreach⁸

As with ten-digit numbering, consumer outreach and education will be a major component in the implementation of the proposed rules. CSDVRS believes that the Commission should utilize all available resources to educate consumers about the continued use of toll free numbers in the iTRS marketplace.

In order to allay the Commission's concerns about inconsistent information being supplied by the various providers, CSDVRS submits that a simple solution would be the creation of central repository of information on the Commission's website, and a mandated posting on all provider websites, similar to that required for E911. CSDVRS also believes a notice posted via U.S. Mail by all providers to all of their registered users would be appropriate to notify the existing consumer base of the mandated changes. CSDVRS also sees a great benefit in utilizing non-profit organizations and/or local State deaf and hard-of-hearing organizations to facilitate additional outreach in their respective communities. Indeed, CSDVRS believes that the

⁸ NPRM at ¶25

Commission may wish to explore contracting with such organizations to provide outreach to underserved areas. Lastly, CSDVRS suggests that the new rules concerning the use of toll free numbers, as well as other VRS information, be included in any disability related publications produced or distributed by the federal government.

Respectfully Submitted,

CSDVRS, LLC

By:

William Banks
General Counsel
CSDVRS, LLC
600 Cleveland Street, Suite 1000
Clearwater, Florida 33755
Phone: (727) 254-5600 | Fax: (727) 443-1537
wbanks@zvrs.com